

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and ) Civil Action No. 3:16-cv-02267  
on Behalf of All Others Similarly Situated, )  
  ) Honorable Aleta A. Trauger  
Plaintiff,   )  
  ) PLAINTIFF'S UNOPPOSED MOTION FOR  
vs.    ) LEAVE TO EXCEED PAGE LIMITATION  
CORRECTIONS CORPORATION OF                     ) FOR REPLY IN SUPPORT OF MOTION TO  
AMERICA, et al.,                                 ) COMPEL (ECF NO. 277)  
   )  
Defendants.   )  
   )  
   )

---

Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), respectfully requests that the Court grant relief from the five-page limit set forth in Rule 7.01(a)(4) of the Local Rules of Court (“Local Rules”) and allow Plaintiff to file an eight-page Reply in Support of Plaintiff’s Motion to Compel Further Interrogatory Responses and for Discovery Sanctions (ECF No. 277) (“Motion to Compel”). Pursuant to the Court’s July 16, 2020 Order, “[r]esponses and replies shall be filed in accordance with Rule 7.01(a).” ECF No. 244. Local Rule 7.01(a)(4) in turn provides that an “optional reply memorandum may be filed within seven (7) days after service of the response, and shall not exceed five (5) pages without leave of Court.” *Id.*

Plaintiff respectfully submits that three additional pages is a modest but necessary extension to fully brief the complex issues raised in Defendants’<sup>1</sup> opposition (ECF No. 285) to Plaintiff’s Motion Compel. Counsel for Plaintiff have conferred with counsel for Defendants regarding this extension, and Defendants’ counsel does not oppose this request. A proposed order is attached hereto.

DATED: August 26, 2020

Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP  
CHRISTOPHER M. WOOD, #032977  
CHRISTOPHER H. LYONS, #034853

---

s/ Christopher M. Wood  
CHRISTOPHER M. WOOD

<sup>1</sup> “Defendants” are Corrections Corporation of America and “Individual Defendants” Damon T. Hininger, David M. Garfinkle, Todd Mullenger and Harley G. Lappin. Following the filing of this action, Defendants rebranded CCA and now refer to it as CoreCivic.

414 Union Street, Suite 900  
Nashville, TN 37219  
Telephone: 800/449-4900  
615/252-3798 (fax)  
cwood@rgrdlaw.com  
clyons@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP  
DENNIS J. HERMAN  
WILLOW E. RADCLIFFE  
KENNETH J. BLACK  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)  
dennish@rgrdlaw.com  
willowr@rgrdlaw.com  
kennyb@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP  
JASON A. FORGE  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
jforge@rgrdlaw.com

Lead Counsel for Plaintiff

BARRETT JOHNSTON MARTIN  
& GARRISON, LLC  
JERRY E. MARTIN, #20193  
Bank of America Plaza  
414 Union Street, Suite 900  
Nashville, TN 37219  
Telephone: 615/244-2202  
615/252-3798 (fax)

Local Counsel

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 26, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood  
CHRISTOPHER M. WOOD

ROBBINS GELLER RUDMAN  
& DOWD LLP  
414 Union Street, Suite 900  
Nashville, TN 37219  
Telephone: 800/449-4900  
615/252-3798 (fax)

E-mail: cwood@rgrdlaw.com

**Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al****Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Kenneth J. Black**  
kennyb@rgrdlaw.com
- **Paul Kent Bramlett**  
pknashlaw@aol.com
- **Robert P. Bramlett**  
robert@bramlettlawoffices.com
- **Christopher T. Cain**  
cain@scottandcain.com,ambrose@scottandcain.com
- **Patrick V. Dahlstrom**  
pdahlstrom@pomlaw.com
- **Jason A. Forge**  
jforge@rgrdlaw.com
- **Brian T. Glennon**  
brian.glennon@lw.com
- **Michael Goldberg**  
michael@goldberglawpc.com
- **Marc Gorrie**  
mgorrie@pomlaw.com
- **Meryn C.N. Grant**  
Meryn.Grant@lw.com
- **Dennis J. Herman**  
dherman@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **James A. Holifield , Jr**  
aholifield@holifieldlaw.com
- **J. Alexander Hood , II**  
ahood@pomlaw.com
- **Jeremy A. Lieberman**  
jalieberman@pomlaw.com,disaacson@pomlaw.com,lpvega@pomlaw.com
- **Christopher Hamp Lyons**  
clyons@rgrdlaw.com,crosini@rgrdlaw.com,KennyB@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **Jerry E. Martin**  
jmartin@barrettjohnston.com,adonovan@barrettjohnston.com,eseaborn@barrettjohnston.com,jmartin@rgrdlaw.com
- **Milton S. McGee , III**  
tmcgee@rwjplc.com,dgibby@rwjplc.com
- **Faraz Mohammadi**  
faraz.mohammadi@lw.com
- **Willow E. Radcliffe**  
willowr@rgrdlaw.com,WillowR@ecf.courtdrive.com
- **Steven Allen Riley**  
sriley@rwjplc.com,dgibby@rwjplc.com
- **Brian Schall**  
brian@goldberglawpc.com
- **David J. Schindler**  
david.schindler@lw.com
- **Sarah A. Tomkowiak**  
sarah.tomkowiak@lw.com

- **Morgan E. Whitworth**  
morgan.whitworth@lw.com,morgan-whitworth-8044@ecf.pacerpro.com
- **Christopher M. Wood**  
cwood@rgrdlaw.com,smorris@rgrdlaw.com,CWood@ecf.courtdrive.com,willowr@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,smorris@ecf.courtdrive.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)